

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CONTINENTAL PAPER GRADING CO.,

Plaintiff,

v.

NATIONAL RAILROAD PASSENGER,
CORPORATION—AMTRAK,

Defendant.

Civil Action No. 1:21-cv-224

JOINT MOTION FOR STAY

The Parties jointly file this Motion For Stay and respectfully request that the Court enter an Order staying this case until July 15, 2022, to allow the Parties to focus their resources on resolving this case, and in support state the following:

1. The Parties have been engaged in settlement negotiations for several months that involved both the resolution of this case and the sale to Defendant National Railroad Passenger Corporation (“Amtrak”) of the property, which is the subject of this litigation and owned by Plaintiff Continental Paper Grading Company (“Continental Paper”). On January 11, 2022, the Parties signed a Letter of Intent regarding Amtrak’s intent to purchase the property from Continental Paper and the Parties’ intent to settle this litigation.

2. Due to the fact that Amtrak is a federally regulated entity, and there are regulatory reviews and approvals that must be obtained by Amtrak before the purchase of the property can be finalized, the property sale and settlement agreement will not be finalized for several months.

3. The Parties agree that the best use of their and the Court's resources will be to focus on finalizing the property sale and settlement rather than engaging in any further litigation of this case.

WHEREFORE, Defendant, the National Railroad Passenger Corporation, and Plaintiff, Continental Paper Grading Company respectfully request this Court enter an order granting a stay of this case, up to and including July 15, 2022, to avoid incurring unnecessary expense and focus their resources on resolution of this case.

Dated: January 12, 2022

Respectfully submitted,

CONTINENTAL PAPER
GRADING COMPANY

NATIONAL RAILROAD PASSENGER
CORPORATION

By: /s/John F. Stoviak
One of Its Attorneys

By: /s/Allison Torrence
One of Its Attorneys

John Gekas, Esquire
Howard M. Berrington, Esquire
SAUL EWING ARNSTEIN &
LEHR LLP
161 North Clark, Suite 4200
Chicago, IL 60601
P:312-876-7124
F:312-876-0288
John.Gekas@saul.com
Howard.Berrington@saul.com

Allison A. Torrence
Matthew G. Lawson
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654-3456
Phone: (312) 923-8347
atorrence@jenner.com
mlawson@jenner.com

OF COUNSEL
(Pro Hac Vice)
John F. Stoviak, Esquire
Cathleen M. Devlin, Esquire
SAUL EWING ARNSTEIN &
LEHR LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
P: 215-972-1095
F: 215-972-1921
John.Stoviak@saul.com
Cathleen.Devlin@saul.com

CERTIFICATE OF SERVICE

I, Allison Torrence, hereby certify that on January 12, 2022, I electronically filed the foregoing Joint Motion for Stay via the Court's CM/ECF system, which will deliver electronic notice of filing to all counsel of record.

/s/ Allison Torrence
Allison Torrence
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654-3456
Phone: (312) 923-8347
atorrence@jenner.com